

District Judge James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RWANGOKO ANDREW,

Plaintiff,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

Case No. 2:24-cv-01375-JLR

STIPULATED MOTION TO CONTINUE
DEADLINE AND ~~PROPOSED~~ ORDER

Noted for Consideration:
November 12, 2024

Plaintiff Rwangoko Andrew and Defendants, through their respective counsel, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, and hereby jointly stipulate and move for a 45-day extension of the deadline for Defendants to respond to the Complaint. A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). Good cause exists to extend Defendants' response deadline to December 27, 2024.

Plaintiff brings this lawsuit pursuant to the Administrative Procedure Act and the Mandamus Act to compel the U.S. Citizenship and Immigration Services ("USCIS") to adjudicate the Forms I-730, Refugee/Asylee Relative Petitions, that Plaintiff filed on behalf of

STIPULATED MOTION AND ~~PROPOSED~~ ORDER
[Case No. 2:24-cv-01375-JLR] - 1

UNITED STATES ATTORNEY
1201 PACIFIC AVE., STE. 700
TACOMA, WA 98402
(253) 428-3800

his wife and children in December 2018. Recently, USCIS has transferred the petitions to the USCIS Nairobi Field Office for scheduling of the interviews. The parties seek this extension to allow the petitions to reach the Nairobi Field Office. At that time, the parties will have a better understanding of the timeframe required to complete the processing of the petitions.

Therefore, the parties agree to and propose that Defendants' deadline to respond to the Complaint be extended to December 27, 2024.

DATED this 12th day of November, 2024.

Respectfully submitted,

TESSA M. GORMAN
United States Attorney

SUMMIT LAW GROUP, PLLC

s/ Michelle R. Lambert

s/ Diana Siri Breaux

MICHELLE R. LAMBERT, NYS #4666657
Assistant United States Attorney
United States Attorney's Office
Western District of Washington
1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
Phone: (253) 428-3824
Fax: (253) 428-3826
Email: michelle.lambert@usdoj.gov

DIANA SIRI BREAU, WSBA #46112
315 Fifth Avenue S., Suite 1000
Seattle, WA 98104
Phone: (206) 676-7000
Email: dianab@summitlaw.com

PATTERSON BELKNAP WEBB & TYLER
LLP

Attorneys for Defendants

s/ Steven A. Zalesin

STEVEN A. ZALESIN*, NYS #2070134

I certify that this memorandum contains 213 words, in compliance with the Local Civil Rules.

s/ Stephanie Sofer

STEPHANIE SOFER*, NYS #5882477

s/ Emma Guido Brill

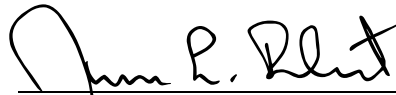
EMMA GUIDO BRILL*, NYS #5562699
1133 Avenue of the Americas
New York, NY 10036
Phone: (212) 336-2000
Email: szalesin@pbwt.com
Email: ssofer@pbwt.com
Email: ebrill@pbwt.com
* Pro Hac Vice Admitted

Attorneys for Plaintiff

[PROPOSED] ORDER

Defendants' deadline to respond to the Complaint is extended to December 27, 2024. It is so **ORDERED**.

DATED this 13th day of November, 2024.



JAMES L. ROBART
United States District Judge